

David H. Chen, Esq.
914.287.6155
dchen@bpslaw.com

Via ECF

Honorable Nelson S. Román
United States District Court
for the Southern District of New York
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, New York 10601

RE: *County of Orange v. The Crossroads Hotel et al.*
Case No. 7:23-cv-4213 (NSR)

Dear Judge Román:

This office represents Plaintiff the County of Orange in the above-referenced action.

Yesterday, an in-person hearing was scheduled for June 8, 2023 at 11:00 AM (ECF Docket # 17). The subject of this hearing is the request to extend the TRO issued in the state court proceeding where this action was originally filed, and Plaintiff's request for leave to file a motion to remand to state court.

Yesterday, Your Honor also issued a preliminary injunction in the case of *Deide et al. v. Day et. al.*, 23-cv-3954 (NSR). This office represents Orange County Executive Steven M. Neuhaus in that action.

Because the preliminary injunction in the *Deide* case has potential implications for the instant action, and specifically regarding the subjects of tomorrow's hearing, we must consult with Mr. Neuhaus in advance. Mr. Neuhaus is currently deployed to Japan, however, in his capacity as a Lieutenant Commander in the U.S. Navy Reserve.

In light of the above, we write to respectfully request a brief adjournment of the scheduled hearing. We can make ourselves available next week at the Court's convenience.

Thank you for your time and consideration.

Respectfully submitted,

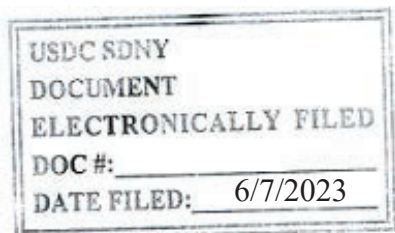
/s/ David H. Chen

cc: All Counsel, via ECF

Pltf's request to adjourn the in-person Oral Argument Hearing from June 8, 2023 until June 14, 2023 at 11:00 am is GRANTED. Any interested party may listen to oral argument via teleconference and is directed to this Court's Order at ECF No. 17 for dial-in instructions. Clerk of Court is requested to terminate the motion at ECF No. 18.
Dated: White Plains, NY
June 7, 2023

SO ORDERED:

HON. NELSON S. ROMÁN
UNITED STATES DISTRICT JUDGE



MEMO ENDORSED